

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re)	Chapter 7
)	
DOUGLAS RAY CORNELL, JR.)	Case No. 19-33636-KLP
)	
5505 Burtwood Lane)	
Richmond, VA 23224)	
SSN / ITIN: xxx-xx-1979)	
)	
Debtor.)	
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333 INVESTMENTS, LLC,)	
)	
Movant)	
)	
v.)	
)	
DOUGLAS RAY CORNELL, JR.,)	
Debtor, and BRUCE E. ROBINSON,)	
Trustee,)	
)	
Respondents.)	
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U.S. BANKRUPTCY COURT
RICHMOND DIVISION
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FILED

**PRO SE DEBTOR'S RESPONSE TO
MOVANT'S MOTION FOR RELIEF FROM THE
AUTOMATIC STAY OF 11 U.S.C. § 362**

NOW COMES PRO SE DEBTOR, DOUGLAS RAY CORNELL, JR. (hereinafter "Debtor" or "Cornell"), in response to the Motion for Relief from the Automatic Stay of 11. U.S.C. § 362 ("Motion") of 333 Investments, LLC (hereinafter "Movant"), and alleges and says as follows:

FIRST RESPONSE

(Response to Allegations)

Debtor Cornell responds to the allegations contained in the numbered paragraphs of Movant's Motion as follows:

1. Admitted, upon information and belief.
2. Admitted.
3. Admitted, upon information and belief.
4. Denied.
5. Admitted, upon information and belief.
6. Denied.
7. Denied..
8. Denied.
 - a. Denied.
 - b. Debtor is without knowledge or information sufficient to permit it to form a belief as to the truth or falsity of the allegations contained in Paragraph 8.a. of Movant's Motion, and therefore denies same.
 - c. Denied.
 - d. Debtor is without knowledge or information sufficient to permit it to form a belief as to the truth or falsity of the allegations contained in Paragraph 8.d. of Movant's Motion, and therefore denies same.
 - e. Debtor is without knowledge or information sufficient to permit it to form a belief as to the truth or falsity of the allegations contained in Paragraph 8.e. of Movant's Motion, and therefore denies same.

f. Debtor is without knowledge or information sufficient to permit it to form a belief as to the truth or falsity of the allegations contained in Paragraph 8.f. of Movant's Motion, and therefore denies same.

g. Debtor is without knowledge or information sufficient to permit it to form a belief as to the truth or falsity of the allegations denies same.

9. Denied.

10. Debtor is without knowledge or information sufficient to permit it to form a belief as to the truth or falsity of the allegations contained in Paragraph 10 of Movant's Motion, and therefore denies same.

11. Debtor is without knowledge or information sufficient to permit it to form a belief as to the truth or falsity of the allegations contained in Paragraph 11 of Movant's Motion, and therefore denies same.

12. Denied.

13. Debtor is without knowledge or information sufficient to permit it to form a belief as to the truth or falsity of the allegations contained in Paragraph 13 of Movant's Motion, and therefore denies same.

14. Denied.

15. Denied.

16. Denied.

17. Debtor is without knowledge or information sufficient to permit it to form a belief as to the truth or falsity of the allegations contained in Paragraph 17 of Movant's Motion, and therefore denies same.

18. Denied.

19. Denied.

20. Denied.

a. Denied.

b. Denied.

c. Denied.

SECOND RESPONSE

(Reservation of Defenses)

Debtor does not waive, and specifically reserves, the right to allege additional defenses and responses to Movant's Motion which maybe disclosed by further investigation and discovery.

WHEREFORE, Debtor respectfully prays unto the Court as follows:

A. That Movant's Motion be denied, with prejudice;

B. That Movant, and its officers, recognize, abide by and honor the relief afforded Debtor by the Automatic Stay of 11 U.S.C. § 362;

C. That Movant, and its officers, be restrained and enjoined from continued violation of the Automatic Stay of 11 U.S.C. § 362;

D. That Movant, and its officers, return possession, custody and control of the Bald Head Island, North Carolina Property to Debtor with haste;

E. That Movant, and its officers, not interfere, or allow others to interfere with, Debtor's possession, custody and control of the Bald Head Island, North Carolina Property;

F. That Movant, and its officers (if and as necessary), be sanctioned for their willful, knowing and intentional violation(s) of the Automatic Stay of 11 U.S.C. § 362;

G. That Movant have and recover nothing of Debtor; and

H. That Debtor have and receive such other and further relief from the Court as it deems just and proper.

Respectfully submitted, this the 2 day of August, 2019.



DOUGLAS RAY CORNELL, JR.

Pro Se Debtor

5505 Burtwood Lane
Richmond, VA 23224

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the foregoing **PRO SE DEBTOR'S RESPONSE TO MOVANT'S MOTION FOR RELIEF FROM THE AUTOMATIC STAY OF 11 U.S.C. § 362** to be served by first-class mail postage prepaid, or email, on all necessary parties as follows:

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Richmond, VA 23219

Robert Van Arsdale, Asst. U.S. Trustee
Office of the U.S. Trustee
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Richmond, VA 23219

This the 2 day of August, 2019.


DOUGLAS RAY CORNELL, JR.
Pro Se Debtor

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Division

In re: Douglas Ray Cornell, Jr.
Debtor(s)

Case No. 19-33636-KLP
Chapter 7

Plaintiff(s)

Adversary Proceeding No.

v.

Defendant(s)

CERTIFICATION UNDER LOCAL BANKRUPTCY RULE 2090-1

Document Title:

Date Document Filed:

Docket Entry No.

I declare under penalty of perjury that (Check one box):

☒ No attorney has prepared or assisted in the preparation of this document.

☐ The following attorney prepared or assisted in the preparation of this document.

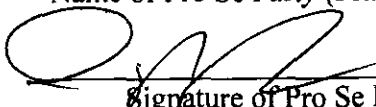
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(Address of Attorney)

(Telephone Number of Attorney)

Douglas R. Cornell, Jr.
Name of Pro Se Party (Print or Type)

Name of Pro Se Party (Print or Type)


Signature of Pro Se Party

Signature of Pro Se Party

Executed on: 8-2-2019 (Date)